

U.S. EPA SUPERFUND PROGRAM
 SEMS
 Five Year Review Issues and Recommendations Report

<u>Site Name</u>	<u>EPA ID</u>	<u>OU</u>	<u>FYR Action</u>	<u>Action ID</u>	<u>Lead</u>	<u>Finish (Actuals)</u>
HUNTERS POINT NAVAL SHIPYARD	CA1170090087	00	FF Five-Year Review	VY6	FF	09/27/19
<u>Site Primary RPM Name:</u> Praskins, Wayne						

FYR Issues and Recommendations

<u>Issue Category</u>	<u>Issue</u>	<u>Affects Prctvns</u>		<u>Recommendation</u>	<u>Parties</u>		<u>Original</u>	<u>Current</u>	<u>Actual</u>	<u>Status</u>	<u>Verified by</u>
		<u>Curr</u>	<u>Fut</u>		<u>Completion</u>	<u>Completion</u>	<u>Completion</u>	<u>Date</u>	<u>Date</u>		
Other	Other Issue (uncategorized)	N	N	Other Recommendation (uncategorized)	F	B	12/31/19	12/31/20		Under Discussion	02/04/20
<u>Issue OU:</u> 02, 03	SVE implementation in Parcels B-1 and C is reducing source mass, but with limited effectiveness due to diffusion-limited conditions in the subsurface. Although ICs will maintain future protectiveness, source removal inefficiency is extending the period within which SVE will be implemented.			It is recommended that use of the SVE technology be evaluated for each treatment area due to inefficiency caused by diffusionlimited conditions. Site-specific studies (e.g., remedy analyses) should be performed to estimate the magnitude and extent of source mass at each treatment area in Parcels B-1 and C to determine if other measures could be implemented to enhance SVE performance in the future. Any changes implemented to the approach for reducing source contamination in SVE areas should be discussed in the next five-year review report. Changes made to the treatment approach should be considered for any other SVE treatment areas at HPNS, including areas where treatment is planned but has not yet been initiated.			Delay due to time constraints				

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Site Name				EPA ID	OU	FYR Action	Action ID	Lead	Finish (Actuals)	
Remedy Performance	Remedy Performance - Other Issue	N	Y	Remedy Performance - Other Recommendation	F	B	11/01/23	11/01/23	Under Discussion	01/06/20
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Issue OU: 02, 03, 04, 09, 10	The Navy has determined that a significant portion of the radiological survey and remediation work completed to date was not reliable because of manipulation and/or falsification of data by one of its radiological contractors. A long-term protectiveness evaluation of the radiological RGs has not yet been completed for this fourth Five-Year Review, and it is currently not known if the RAOs for radionuclides have been achieved in Parcels B-1, B-2, C, D-1, D-2, G, E, UC-1, UC-2, and UC-3.			The Navy is in the process of implementing corrective actions to ensure that the radiological remedies specified in the decision documents are implemented as intended. In addition, the Navy is in the process of conducting a long-term protectiveness evaluation of the ROD radiological RGs. After finalization of the Five-Year Review, the Navy will issue a draft addendum evaluating the long-term protectiveness of the RGs for soil using RESRAD and the EPA's Preliminary Remediation Goal (PRG) Calculator for radiation risk to human health. Another draft addendum evaluating the longterm protectiveness of the RGs for buildings (for both residential and commercial/industrial scenarios) will also be issued. The draft addenda will include explanations of the proposed site-specific inputs and will be issued to the public and regulatory agencies for a 30-day review and comment period. The Navy will prepare responses to regulatory agency comments and a responsiveness summary to comments from the public. The results of the final evaluations will inform the retesting sensitivity and cleanup thresholds. These risk evaluations may also inform future risk management decisions and the potential for post-ROD changes, if appropriate. It is anticipated that the radiological rework will be completed prior to the next Five-Year Review. Interim Milestone Dates: Draft Addendum for Soil – 1 month after finalization of the Five-Year Review Draft Addendum for Buildings – 2 months after finalization of the Five-Year Review						

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Remedy Performance	Remedy Performance - Other Issue	N	Y	Remedy Performance - Other Recommendation	F	B	12/31/19	12/31/20	Under Discussion	02/04/20
<u>Issue OU:</u> 02, 04, 09	The regulatory agencies do not agree with the Navy's risk assessment methodology used to reduce the ARICs for VOC vapors.			The Navy intends to consider agency concerns (including specific recommendations made by EPA) and reevaluate its approach to calculating SGALs, which may affect the ARICs for VOC vapors at Parcels B-1, B-2, D-1, and G. Appendix E evaluates how EPA's recommendations may affect the SGALs and the ARICs for VOC vapors. Based on the information in Appendix E, none of the potential changes to the ARICs for VOC vapors affect the current protectiveness of the remedies at Parcels B-1, B-2, D-1, and G. The regulatory agencies are currently reviewing and reevaluating their methods for assessing vapor intrusion risk. Once consensus is achieved, the Navy should reevaluate its approach for calculating SGALs and adjusting ARICs for VOC vapors. The new SGALs would be developed based on the most current standards, toxicity criteria, and risk assessment methods. The new SGALs would be used to redefine the ARICs for soil gas at each parcel prior to property transfer. Any changes to soil gas risk assessment methodology should be discussed in the next five-year review report.			Delay due to time constraints			

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